

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE:	§	
	§	CASE NO. 10-93904-BHL-11
EASTERN LIVESTOCK CO., LLC,	§	
	§	CHAPTER 11
Alleged Debtor.	§	
	§	

**LIMITED OBJECTION TO EMERGENCY MOTION FOR ORDER AUTHORIZING
CHAPTER 11 TRUSTEE TO SETTLE A CLASS OF CONTRACTS PURSUANT TO
BANKRUPTCY RULE 9019(B)**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Interested Parties, Friona Industries, LP (“Friona”), Cactus Growers, Inc. (“Cactus”), and J & F Oklahoma Holdings, Inc. (“J&F”), collectively “Movants,” file this Limited Objection to Emergency Motion for Order Authorizing Chapter 11 Trustee to Settle a Class of Contracts Pursuant to Bankruptcy Rule 9019(B), and would show the Court as follows:

1. On December 30, 2010, the Chapter 11 Trustee (the “Trustee”) filed his Emergency Motion for Order Authorizing Chapter 11 Trustee to Settle a Class of Contracts Pursuant to Bankruptcy Rule 9019(B) (“Trustee’s Motion”). Trustee’s Motion seeks authority to negotiate and settle unspecified contracts for future delivery of cattle or to assume and assign such contracts.

2. The contracts at issue appear to only relate to contracts for the future purchase of cattle by Debtor that are expiring or for which a demand for adequate assurance of performance was made. However, the Trustee’s Motion is unclear. There is no other description of, or explanation about, the contracts, the terms of the contracts, or the parties to the contracts. The Trustee is simply asking the Court to grant him broad authority to do as he wishes with regard to numerous unknown transactions.

3. Likewise, the Trustee is asking the Court grant him authority to assume and assign such contracts. There is no explanation of how the Debtor intends to perform under an assumed contract or an explanation of to whom the Trustee intends to assign such contracts.

4. Therefore, the Movants file this limited objection as they are unable to determine the nature of the Trustee's Motion as the Trustee's Motion is too vague and general.

Respectfully submitted,

/s/ John Massouh

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ATTORNEYS FOR MOVANTS.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic and/or U.S. Mail this 3rd day of January, 2011 upon all parties entitled to such notice as provided by the ECF filing system.

/s/John Massouh

John Massouh

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